

Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
Via E-mail: doer.biomass@state.ma.us
RE: Massachusetts RPS Biomass Proposed Final Regulations

Dear Department of Energy Resources,

The undersigned residents of Massachusetts respectfully submit the following comments on the proposed Massachusetts Renewable Portfolio Standard Biomass Regulations.

It is our opinion that burning wood for electricity production will negatively impact our forests, air quality, the public's health and contribute unnecessarily to greenhouse gas emissions. We support the use of our limited public resources for energy conservation.

In 2011, many of us requested a moratorium on all biomass electricity generation facilities for three years in order to fully study the financial, environmental and public health implications of biomass power plants. We view former Secretary Ian Bowles' recommendations for regulations to be an inevitable compromise. His recommendation was that projects must achieve 60% efficiency to qualify for renewable energy credits.

Regarding the April 2012 version of the biomass regulations, we thank DOER for adjusting the carbon accounting mechanism so that it follows the generally understood principles that forest residues do not have the same carbon profile as living carbon sequestering trees. Adjusting the provisions to protect the forest ecology by creating minimum retention standards for residues and placing some limits on the amount of residues that can be taken from the forest floor is an attempt to ensure that our forested land is protected from severe over harvesting.

Given that the results of the Manomet study, which these regulations are presumably responding to, were based on using 75% efficiency for Combined Heat and Power, we are asking DOER to require that the minimum efficiency for all biomass electricity generators to be 60%. That includes "advanced" systems that your current proposal would reward with subsidies at 40% efficiency.

The proposed regulation includes "Merchantable Bioproducts" in the calculations of the efficiency standards, an assessment that has no precedent in any state or country's regulations and completely ignores scientific accounting methods. The creation of these bioproducts does not affect the efficiency of electricity production, and to include it as a way to improve the efficiency on paper is effectively asking ratepayers to help pay for the manufacturing of a product that will have its own market, and would give renewable energy credits to power projects that don't meet the efficiency standards. Therefore, we request that counting "merchantable bioproducts" as part of the energy efficiency assessment be removed from the regulations.

We question allowing licensed foresters who are being paid by land owners to harvest wood for biomass being the agents signing off on compliance with your proposed guidelines for allowable harvesting limits. We are requesting additional measures be put in place to correct this inherent conflict of interest.

Our view is that our forested lands be considered first and foremost as resources for clean air, clear water, and important resources for wildlife habitat that most Massachusetts residents value. Therefore, we are asking that the guidelines continue to re-evaluate biomass harvesting with an eye toward maximum over all forest health and greenhouse gas sequestering capacity as a way to achieve our goal of slowing global warming.

We thank you for your efforts in making standards that attempt to minimize the negative impacts of biomass energy production.

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